

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

TEAL PEAK CAPITAL, LLC;

Plaintiff,

v.

ALAN BRAM GOLDMAN;

Defendant.

Case No. 3:20-CV-01747 (PAD)

BREACH OF CONTRACT; SPECIFIC PERFORMANCE OF CONTRACT;
REIMBURSEMENT OF FUNDS, COSTS AND EXPENSES

DEFENDANT'S MOTION FOR BRIEF EXTENSION OF TIME
TO ANSWER PLAINTIFF'S RENEWED MOTION REQUESTING ORDER OF PROHIBITION
TO ALIENATE AND/OR OTHERWISE DISPOSE OF REAL PROPERTY

TO THE HONORABLE COURT:

COMES NOW, defendant Alan Bram Goldman (hereinafter, "Mr. Goldman"), through the undersigned attorney, and very respectfully states and prays:

1. On March 12, 2021, Teal Peak Capital, LLC (hereinafter, "Plaintiff") filed a Renewed Motion Requesting Order of Prohibition to Alienate and/or Otherwise Dispose of Real Property (hereinafter, the "Renewed Motion").
2. Mr. Goldman has until March 26, 2021 to oppose the Renewed Motion.
3. For the following reasons, Mr. Goldman respectfully requests from this Honorable Court a brief extension until April 7, 2021 to file his opposition. This date matches the deadline Mr. Goldman has to answer the Complaint and will cause no undue delay in these proceedings.
4. The undersigned received just two weeks ago most, but not all, of the relevant documentation that Mr. Goldman had pledged to send to answer the Complaint due to unforeseen postal delays. Mr. Goldman then forwarded additional documents in response to the Complaint and the Renewed Motion, which the undersigned is reviewing. Mr. Goldman is a Cancer survivor, recovers from other serious medical conditions, and his recovery has been

complicated by the COVID-19 pandemic. Mr. Goldman has lived alone in his home in Montpelier since the lockdown with no family and no pets, which has been a challenge to case preparation.

5. The requested extension of time is not for the purpose of delay, but rather it is made in good faith to give Mr. Goldman the opportunity to present before this Court his side of the story with a complete and comprehensive opposition.

6. For these reasons, Mr. Goldman requires a short extension of time to expire on April 7, 2021, the same day his responsive pleading is due. Again, this date matches the deadline Mr. Goldman has to answer the Complaint and it will not unnecessarily delay the proceedings.

WHEREFORE, for the foregoing reasons, Mr. Goldman respectfully requests that the Court allow him an extension of time until April 7, 2021, to file his opposition to the Renewed Motion.

Respectfully Submitted,

In San Juan, Puerto Rico, this 23rd day of March 2021.

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Attorney for Alan Bram Goldman

IT IS HEREBY CERTIFIED that on this date we filed a true and correct copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice electronically to all counsel at their address of record.

Date: March 23, 2021

By: s/Antonio A. Arias-Larcada
Attorney